

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Revision of the Commission's Rules
To Ensure Compatibility with
Enhanced 911 Emergency Calling Systems

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CC Docket No. 94-102

**SPRINT CORPORATION
FIFTEENTH QUARTERLY
E911 IMPLEMENTATION REPORT**

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SUMMARY

Sprint reports on its continuing efforts to deploy wireless enhanced 911 services during the second quarter of 2005. Sprint remains committed to wireless E911, completing nearly 260 Phase I and II system deployments across the United States during the most recent quarter. Sprint has now launched Phase I services in 2,631 PSAPs and is providing Phase II service to 1,730 PSAPs. The following provides highlights of Sprint's accomplishments to date:

- Sprint was the first and only carrier to begin selling GPS enabled devices on October 1, 2001.
- Sprint was the first carrier to deploy a handset based Phase II operating system – deploying service covering the State of Rhode Island in December 2001.
- Sprint was the first to complete installation of all the national platforms, switch and cell site upgrades required to support Phase II E911 service across its entire nationwide network on June 14, 2002, more than a month ahead of the FCC's deadline. Sprint has been capable of supporting Phase II implementations nationwide for more than three years.
- Sprint was the first carrier to effectively convert 100% of all new handset activations to GPS enabled devices, reaching 99% of new handset activations on June 28, 2003.
- Sprint has distributed over 40 million GPS-enabled handsets since October 2001. Sprint has offered more than forty different GPS enabled handset models since October 1, 2001. Indeed, many older Phase II handsets have been phased out of the current handset lineup as obsolete.
- Sprint deployed 125 new Phase I PSAPs during the second quarter of 2005, for a total of 2,631 Phase I PSAPs in portions of forty-eight states, Puerto Rico and the District of Columbia.
- Sprint deployed 135 new Phase II PSAPs during the second quarter of 2005, for a total of 1,730 PSAPs in portions of forty-four states, Puerto Rico and the District of Columbia.

Despite Sprint's significant capital investment and support, ubiquitous deployment of enhanced 911 services does not appear to be likely any time in the near future. The vast majority of PSAPs have not requested the deployment of either Phase I or II services. Sprint cannot unilaterally deploy these services and must also rely upon public safety and local exchange carriers to take the steps necessary to implement these services. Sprint will continue to work cooperatively with LECs, PSAPs, vendors, regulatory bodies and public officials to overcome remaining technical and administrative hurdles facing E911 deployment, and it also urges the Commission to continue its efforts to ensure nationwide deployment of this important public safety technology.

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Sprint Corporation, on behalf of its wireless operating company, Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint"), submits its Fifteenth Quarterly Phase II Implementation Report in compliance with the Commission's October 12, 2001 *Sprint Waiver Order*.¹

I. INTRODUCTION

Sprint completed 135 Phase II PSAP launches and 125 Phase I launches during the second quarter of 2005, and Phase I and II services are now available in portions of 48 states, Puerto Rico and the District of Columbia. Notwithstanding this progress, the majority of Public Safety Answering Points ("PSAPs") have yet to request Phase I or II service. Sprint again advises the Commission that it cannot unilaterally deploy enhanced 911 services and that the availability of E911 depends upon numerous factors outside of Sprint's control. Sprint encourages the Commission to continue to seek ways of increasing deployment of this public safety service.

¹ See, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Sprint Spectrum L.P. d/b/a Sprint*, 16 FCC Rcd 18330 (2001) ("Sprint Waiver Order").

This report contains information regarding the status of Sprint's enhanced 911 deployment efforts through the end of the second quarter of 2005, June 30, 2005, and does not attempt to duplicate information provided to the Commission in previous filings. Sprint's previous Quarterly E911 Reports and filings in this docket provide additional information regarding the issues surrounding the deployment of Phase I and II services and Sprint's compliance with the Commission's rules. To the extent information contained in prior reports remains relevant to Sprint's compliance efforts, Sprint hereby incorporates those filings herein by reference.²

II. CURRENT STATUS OF PHASE I AND II REQUESTS

The *Sprint Waiver Order* specified that the Sprint quarterly reports "must include information on all pending Phase I and Phase II requests."³ Sprint provides this information below.

A. Phase I Status

Sprint has worked cooperatively with PSAPs across the country to deploy Phase I (cell site/sector location) E911 services. It has accommodated Phase I requests regardless of PSAP technology choices and has utilized CAS, NCAS and Hybrid CAS/NCAS (*i.e.*, LEC) solutions. As of June 30, 2005, Sprint is providing Phase I E911 services to approximately 2,631 PSAPs in

² See *In the Matter of Revision of the Commissions Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Joint Sprint PCS Phase II Implementation Report (November 9, 2000); Sprint PCS First Quarterly E911 Implementation Report, (February 1, 2002); Sprint Second Quarterly Report (May 2002); Third Quarterly E911 Implementation Report (April 29, 2002); Sprint Quarterly E911 Implementation Report (August 1, 2002); Sprint Quarterly E911 Implementation Report (November 1, 2002); Sprint Corporation Quarterly E911 Implementation Report (February 1, 2003); Sprint Corporation Quarterly E911 Implementation Report (May 1, 2003); Sprint Corporation Seventh Quarterly E911 Implementation Report (August 1, 2003); Sprint Corporation Eighth Quarterly E911 Implementation Report (November 1, 2003); Sprint Corporation Ninth Quarterly E911 Implementation Report (February 2, 2004); Sprint Corporation Tenth Quarterly E911 Implementation Report (May 3, 2004); Sprint Corporation Eleventh E911 Implementation Report (August 2, 2004); Sprint Corporation Twelfth Quarterly E911 Implementation Report (November 1, 2004); Sprint Corporation Thirteenth Quarterly E911 Implementation Report (February 1, 2005); and Sprint Corporation Fourteenth Quarterly E911 Implementation Report (May 2, 2005).

³ *Sprint Waiver Order* at ¶ 28.

portions of forty-eight states, Puerto Rico and the District of Columbia, which represents the addition of approximately 125 Phase I systems from last quarter. Details regarding the status of Phase I requests are contained within Appendix A.

The "Date PSAP Made Request" column in Appendix A indicates the date a PSAP request was issued, even if the PSAP did not at that time meet the prerequisites of Rule 20.18. Sprint's objective is to deploy Phase I with as many PSAPs as possible. Accordingly, Sprint has not attempted to segregate those requests as valid or invalid under the prerequisites contained in Rule 20.18, but has attempted to move forward on all requests. Where deployment is not possible within six months of a request, Sprint has established an agreed upon deployment schedule as permitted under the Commission's *Richardson Reconsideration Order*.⁴ At the Commission's request, Sprint will provide additional information with respect to specific deployments and PSAP circumstances presented in each case.

B. Phase II Status

Sprint continues to aggressively deploy Phase II services to requesting PSAPs. Sprint launched 135 new PSAPs in the last quarter bringing total deployments to 1,730 PSAPs in portions of forty-four states, Puerto Rico and the District of Columbia. Details regarding the status of specific Phase II requests are contained in Appendix A attached hereto.

Sprint has also not attempted to segregate Phase II requests based upon validity under the *Richardson Order*, and the Company has moved forward with implementation efforts in all requesting PSAPs. Moreover, Sprint has reached an agreed upon implementation schedule with each of the Phase II requesting PSAPs as permitted under the *Richardson Reconsideration Order* and accordingly, Sprint is in compliance with the Commission's rules regardless of the validity

of a given request. To confirm, however, where a PSAP has made a Phase II request, and the ALI provider has not upgraded its ALI database, or prohibits the use of that ALI database contingent upon tariff approval, the PSAP is unable to receive or utilize Phase II information. As Sprint has noted in previous filings, a PSAP will be unable to receive Phase II data unless the necessary ALI and CPE upgrades have been performed.⁵

III. NETWORK READINESS

The *Sprint Waiver Order* specified that the quarterly report contain a statement whether “Sprint has completed its Phase II conversion of all Lucent switching software” by May 30, 2002, and “whether Sprint has completed its Phase II conversion of all Nortel switching software” by August 1, 2002. Sprint completed these network upgrades by the FCC’s benchmark dates; in fact, it completed the required installation of all national platforms and upgrades to its network infrastructure ahead of the Commission’s schedule. Sprint’s entire national network has now been Phase II enabled for more than three years.

A. Lucent Markets

Sprint completed installation of switch software upgrades in all of its Lucent markets on March 6, 2002, almost three months in advance of the Commission’s May 30, 2002 deadline.

B. Nortel Markets

Sprint completed installation of switch software upgrades in all of its Nortel markets on June 14, 2002, over a month and a half in advance of the Commission’s August 1, 2002 deadline.

⁴ *In the Matter of Petition of City of Richardson Texas*, Order on Reconsideration, CC Docket 94-102, FCC 02-318, (November 26, 2002) ¶29.

⁵ See Sprint Reply Comments in Support of its Petition for Reconsideration and Clarification, CC Docket No. 94-102 (Jan. 28, 2002).

IV. CURRENT HANDSET ACTIVATIONS AND SALES

The *Sprint Waiver Order* specified that the Sprint quarterly reports “must also include information on current handset models being activated or sold that are GPS-capable and important events effecting location-capable handset penetration levels, such as introduction of new handset models.”⁶

Sprint set a new standard for the industry by becoming the first carrier to effectively meet the Commission’s 100% new activation requirement during the third quarter of 2003. For the week ending June 28, 2003, 99.5% of new handset activations from all Sprint controlled outlets were GPS enabled. 93.7% of *all* handset activations, including used handsets, older models and handsets sold through third party outlets, were GPS enabled.⁷ Sprint has introduced more than forty GPS enabled handset models since October 1, 2001. Indeed, many of the early GPS handset models have been retired as obsolete. All new handset models introduced by Sprint are GPS enabled, and have been since January of 2003. With the exception of an extremely limited amount of older inventory purchased prior to that date, all Sprint handset models are GPS enabled. As of the end of the first quarter of 2005, Sprint had distributed over 40 million GPS-enabled handsets.

⁶ *Sprint Waiver Order* at ¶ 28.

⁷ FCC rules exclude older models and refurbished models from the benchmark calculation. See *Fourth E911 Order*, 15 FCC Rcd 17442, 17455 n.62 (2000) (“The new handset activation benchmarks apply only to new handsets, not to new activations of older model or refurbished handsets.”). Because reactivations of used handsets are not tracked in the same manner as total gross activations, the exact percentage of GPS enabled new handset activations (the benchmark measurement) required separate calculation. A sample study of handset sales for the first two weeks of June 2003 showed that approximately 10% of total gross additions were in fact reactivations of previously used handsets. As would be expected, the majority of these reactivated/used handsets were older non-GPS enabled models. Once these handsets are eliminated from total gross activations, as required under the rules, the GPS enabled new handset activation rate for all outlets, including third party retailers, was 98.13%.

V. COMPLIANCE WITH OUTSTANDING BENCHMARKS

The *Sprint Waiver Order* specified that the Sprint reports “must also contain statements regarding whether Sprint PCS has met each deployment benchmark and, if not, the reasons for its failure to comply.”⁸

Sprint has met all benchmarks passed through the end of the second quarter of 2005, including the revised benchmark for compliance with the Commission’s requirement that 100% of new handset activations be GPS enabled by June 30, 2003 (with the clarifications outlined above).⁹ Specifically, Sprint began selling GPS handsets by October 1, 2001. Sprint met the interim benchmark that 25% of handset activations be GPS enabled by July 31, 2002. Sprint completed network upgrades to its Lucent and Nortel switches well before the Commission deadlines of May 30, 2002 and August 1, 2002. The Commission also ordered Sprint to provide service to all PSAPs who had made a valid request on or before June 30, 2002, by December 31, 2002. The majority of requests received prior to June 30, 2002 would be considered invalid under the rules in effect at the time the requests were issued, because the PSAP was unable to receive or utilize Phase II information. The validity of these requests should no longer be an issue, however, because Sprint has reached agreement with Phase I and II requesting PSAPs regarding implementation dates as permitted under the *Richardson Reconsideration Order*.¹⁰ Accordingly, Sprint is in compliance with the *Sprint Waiver Order*.

⁸ *Sprint Waiver Order* at ¶ 28.

⁹ See *In the Matter of Request for a Limited and Temporary Rule Waiver by Sprint*, FCC 03-133, Order, CC Docket 94-102 (June 16, 2003).

¹⁰ On October 24, 2004, the Enforcement Bureau of the FCC issued a Notice of Apparent Liability (“NAL”) finding that Sprint PCS had failed to provide Phase I service within six months of a request by Santa Cruz County, Arizona (“Santa Cruz”) in violation of rule 20.18(d). *In the Matter of Sprint Spectrum L.P. d/b/a Sprint PCS*, Notice of Apparent Liability for Forfeiture, EB-04-SE-054, (October 24, 2004). Sprint contested the validity of this NAL. The parties recently entered into a Consent Decree re-

The FCC requires CMRS carriers deploying handset based Phase II enhanced 911 systems to ensure that 95% of their embedded handset base is GPS enabled by December 31, 2005.¹¹ As noted above, Sprint has distributed more than 40 million GPS handsets to date. Sprint also offers subsidies to existing customers on new handsets where an end user has held the same handset for 18 or more months; Sprint continues to offer other new and innovative features that would entice handset conversion; and it competitively prices its handsets, notwithstanding the increased cost of GPS technology. Sprint cannot, however, require customers to abandon working handsets or refuse to offer service to customers that choose not to replace a handset (customers may, for example, not want to invest the added effort of reprogramming address books). Sprint will continue its efforts, however, to encourage its end user customers to convert their older handsets to newer GPS enabled devices.

The *Sprint Waiver Order* also directed Sprint to provide a statement regarding the accuracy milestone. The rules provide that handset-based location solutions must provide the location of wireless 911 calls with an accuracy of 50 meters for 67 percent of calls and 150 meters for 95 percent of calls.¹² Prior to deploying the assisted GPS solution, Sprint conducted testing in conjunction with its vendors to determine whether the system would meet FCC standards. After deploying the system, Sprint has conducted field tests in various markets to validate that the system is operating properly. Sprint also tests each new GPS handset model as it is introduced into the market to ensure that it meets expected performance parameters. Based upon this infor-

solving this matter. See *In the Matter of Sprint Spectrum L.P.d/b/a Sprint PCS*, File No. EB-04-SE-054, Order (July 20, 2005).

¹¹ 47 C.F.R. §20.18(g)(1)(v).

¹² 47 C.F.R. § 20.18(h)(2).

mation, Sprint believes that its current location technology satisfies the FCC's accuracy requirements.

Additional specific standards for testing accuracy have recently been completed by the Emergency Services Interconnection Forum and are being further defined by the Network Reliability and Interoperability Council. Sprint has begun to develop the systems and processes that would meet these testing protocols and intends to conduct testing in compliance with these standards and timelines when finalized. Sprint notes, however, that the basic operational characteristics of this technology will not change based upon the amount of testing conducted.

VI. AFFIDAVIT REQUIREMENT

The *Sprint Waiver Order* specifies that Sprint "must support each Quarterly Report with an affidavit, from an officer or director of Sprint, attesting to the truth and accuracy of the report."¹³ Appendix B is the conforming Declaration of Kathy A. Walker, Executive Vice President – Network Services, Sprint.

VII. CONCLUSION

Sprint remains a leader in E911 deployment efforts and committed to ubiquitous deployment of this important public safety technology.

¹³ *Sprint Waiver Order* at ¶ 28.

Respectfully submitted,

**SPRINT CORPORATION on behalf of
SPRINT SPECTRUM L.P., d/b/a Sprint PCS**

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